

1 **Linda St. Pierre**
2 **Oregon Bar No. 200446**
3 **McCalla Raymer Leibert Pierce, LLC**
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6 **UNITED STATES BANKRUPTCY COURT**
7 **DISTRICT OF OREGON**
8 **EUGENE DIVISION**

9 In re:

10 Cory Eugene Williams and
11 Tina Sue Williams,
12 Debtors.

Case No.: 23-61565-tmr13

**OBJECTION TO CONFIRMATION OF
PLAN**

13 COMES NOW Freedom Mortgage Corporation (hereinafter known as "Creditor"), a
14 secured creditor holding a Deed of Trust against the real property commonly known as 88404
15 Stephens Rd, Springfield, OR 97478 (the "Property"), and for the reasons stated below, objects
16 to confirmation of Debtors Chapter 13 plan (Doc. No. 2) (the "Plan").

17 1. Debtors' Plan does not treat Creditor's prepetition arrearage claim of \$2,252.44 as
18 set forth in its Proof of Claim filed in this case on October 9, 2023, as claim (8-1).

19 2. Confirmation of the Plan should be denied until Debtors amend the Plan to
20 properly treat Creditor's claim.

21 4. Creditor reserves the right to supplement and/or amend this Objection to
22 Confirmation.

WHEREFORE, Creditor prays that the Court will:

1. deny confirmation,
 2. award reasonable attorney's fees, and
 3. grant such other and further relief as is just and equitable.

Dated: February 8, 2024

McCalla Raymer Leibert Pierce, LLC

By:/s/Linda St. Pierre

Linda St. Pierre
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Attorney for Secured Creditor
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Hartford, CT06120
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON
EUGENE DIVISION**

In re:

Case No.: 23-61565-tmr13

Cory Eugene Williams and
Tina Sue Williams,
Debtors.

PROOF OF SERVICE

I hereby certify, under penalty of perjury pursuant to 28 U.S.C. Sec. 1746 and the laws of the United States, and declare as follows:

1. That I am a citizen of the United States, over the age of 21 years and competent to be a witness herein.
 2. That on February 8, 2024, I transmitted by depositing in the United States mail, postage paid copies of the: Objection to Confirmation of Plan, addressed as follows:

Cory Eugene Williams
Tina Sue Williams
88404 Stephens Road
Springfield, OR 97478
P.M.

Debtors

Devon Thorson
Recovery Law Group
10260 SW Greensburg Road
Ste 4th Floor
Portland, OR 97223

Attorney for Debtors

Naliko Market
Office of the Standing Chapter 13 Trustee
400 E. 2nd Ave., Ste 200
Eugene, OR 97401
T: 541-345-1111

Trustee

US Trustee
US Trustee, Eugene
405 E 8th Ave #1100
Eugene, OR 97401-2706

1 Copies were also transmitted electronically via ECF to:

- 2
- 3 • Devon Thorson dthorson@recoverylawgroup.com
4 • US Trustee USTPRegion18.EG.ECF@usdoj.gov
5 • Naliko Markel ecf@eugene13.com

6 Dated: February 8, 2024 McCalla Raymer Leibert Pierce, LLC

7 By:/s/*Linda St. Pierre*

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9 Oregon Bar No. 200446
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